IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: TESTOSTERONE REPLACEMENT	MDL No. 2545				
THERAPY PRODUCTS LIABILITY LITIGATION	Master Docket Case No. 1:14-cv-01748				
	Honorable Matthew F. Kennelly				
	, and the second				
Plaintiff(s),					
V.					
	Case No.:				
Defendant(s).					
All parties are to be included per Fed.R.Civ.P. 10(a)					
MASTER SHORT-I	FORM COMPLAINT				
For Individ	DUAL CLAIMS				
1. Plaintiff(s),					
state(s) and incorporate(s) by reference the portions indicated below of Plaintiffs' Master					
Long Form Complaint on file with the Clerk of the Court for the United States District					
Court for the Northern District of Illinois	in the matter entitled In Re: Testosterone				
Replacement Therapy Products Liability Litigation, MDL No. 2545. Plaintiff(s) [is/are] filing					
this Short Form Complaint as permitted by Case Management Order No. 20 of this Court					

2. In addition to the below-indicated portions of the Master Long Form Complaint adopted by the plaintiff(s) and incorporated by reference herein, Plaintiff(s) hereby allege(s) as follows:

for cases filed directly into this district.

VENUE

3.	Venue for	remand	and	trial	is	proper	in	the	following	federal	judicial
district:											

IDENTIFICATION OF PLAINTIFF(S) AND RELATED INTERESTED PARTIES

4.		Name and residence of individual injured by Testosterone Replacement
Therapy	pro	duct(s) ("TRT"):
5.		Consortium Claim(s): The following individual(s) allege damages for loss
of conso	rtiur	n;
6.		Survival and/or Wrongful Death claims:
	a.	Name and residence of Decedent when he suffered TRT-related injuries
		and/or death:
	b.	Name and residence of individual(s) entitled to bring the claims on behalf
		of the decedent's estate (e.g., personal representative, administrator, next of
		kin, successor in interest, etc.)
		CASE SPECIFIC FACTS
		REGARDING TRT USE AND INJURIES
7.	,	Plaintiff currently resides in (city, state):
8.		At the time of the TRT-caused injury, [Plaintiff/Decedent] resided in (city,
state):		
9.		[Plaintiff/Decedent] began using TRT as prescribed and indicated on or
about th	e fol	lowing date:
10	0.	[Plaintiff/Decedent] discontinued TRT use on or about the following date:

	11. [Plaintiff/Decedent] used the	e follov	ving TRT products, which Plaintiff						
conte	nds caused his injury(ies):								
	AndroGel Testim Axiron Depo-Testosterone Androderm Testopel Fortesta		Striant Delatestryl Other(s) (please specify):						
	12. [Plaintiff/Decedent] is suing the following Defendants:								
	AbbVie Inc. Abbott Laboratories AbbVie Products LLC Unimed Pharmaceuticals, LLC Besins Healthcare Inc. Besins Healthcare, S.A. Eli Lilly and Company Lilly USA, LLC Acrux Commercial Pty Ltd. Acrux DDS Pty Ltd. Pfizer, Inc. Pharmacia & Upjohn Company Inc.		Endo Pharmaceuticals, Inc. Auxilium Pharmaceuticals, Inc. GlaxoSmithKline, LLC Actavis, Inc. Actavis Pharma, Inc. Actavis Laboratories UT, Inc. Anda, Inc.						
	Other(s) (please specify):		·						
who	13. [Plaintiff/Decedent] is bringidid not manufacture TRT and only act a. TRT product(s) distributed:		against the following Defendant(s), distributor for TRT manufacturers:						

b.	Conduct supporting claims:
14.	TRT caused serious injuries and damages including but not limited to the
following:	
15.	Approximate date of TRT injury:
	ALLEGATIONS, CLAIMS, AND THEORIES OF RECOVERY
	ADOPTED AND INCORPORATED IN THIS LAWSUIT
16.	Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth
fully herein,	all common allegations contained in paragraphs 1 through 466 of the
Master Long	Form Complaint on file with the Clerk of the Court for the United States
District Cou	rt for the Northern District of Illinois in the matter entitled In Re:
Testosterone 1	Replacement Therapy Products Liability Litigation, MDL No. 2545.
17.	Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth
fully herein,	the following damages and causes of action of the Master Long Form
Complaint or	n file with the Clerk of the Court for the United States District Court for the
Northern Dis	strict of Illinois in the matter entitled <i>In Re: Testosterone Replacement Therapy</i>
Products Liab	ility Litigation, MDL No. 2545:
	Count I – Strict Liability – Design Defect
	Count II – Strict Liability – Failure to Warn
	Count III - Negligence

	Coun	it IV – Negligent Misi	representation				
	□ Count V - Breach of Implied Warranty of Merchantability						
	□ Count VI – Breach of Express Warranty						
	□ Count VII - Fraud						
	□ Count VIII - Redhibition						
	Coun	at IX – Consumer Pro	tection				
	□ Count X – Unjust Enrichment						
	□ Count XI – Wrongful Death						
	Coun	ıt XII – Survival Actio	on				
	□ Count XIII – Loss of Consortium						
	□ Count XIV - Punitive Damages						
	Praye	er for Relief					
	Other	r State Law Causes of	f Action as Follows:				
		Jur	RY DEMAND				
Plaintiff(s	s) demand	l(s) a trial by jury as t	to all claims in this action.				
Dated thi	s the	day of	, 20				
			JLLY SUBMITTED F OF THE PLAINTIFF(S),				
Signature							
OF COUI	NSEL:	(name) (firm) (address) (phone) (email)					